

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

BRANNON CASTLEBERRY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 9:22-cv-4133-RMG
)	
SIDNEY POWELL, et al.,)	
)	
Defendants.)	
)	

**DEFENDANT DEFENDING THE REPUBLIC, INC.'S ANSWERS TO RULE 26.01
INTERROGATORIES**

Defendant Defending the Republic, Inc. ("DTR") submits the following responses to Local Rule 26.01 Interrogatories:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: DTR submits that the claims should be dismissed.

(C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: DTR is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER: DTR asserts that this Court lacks personal jurisdiction of it in this matter and that none of the criteria in Local Rule 3.01 apply in this case. None of the parties reside here,

none of the events or omissions giving rise to Plaintiff's claims occurred here, DTR is not organized in and does not reside in South Carolina, and DTR did not do any business relating to Plaintiff's claims in South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: DTR is correctly identified.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: Plaintiff's claims are allegedly based on the actions of Dominion Voting Systems, Inc. *See* Plaintiff's Complaint at ¶¶ 26-29.

(H) Parties or Intervenors in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER: DTR is a non-profit corporation organized under the laws of the State of Texas and with its principal place of business in Texas.

Respectfully submitted,

Laughlin & Bowen P.C.

/s/ John R.C. Bowen
John R.C. Bowen, Esq. Fed. Bar No. 1403
P.O. Drawer 21119
Hilton Head Island, South Carolina 29925
(843) 689-5700 (T)
(843) 689-5990 (F)
John@laughlinandbowen.com
Counsel for Defendant
Defending the Republic, Inc.

Motion for Admission *Pro Hac Vice* pending

David C. Tobin, Esq.
Tobin O'Connor Concino P.C.
5335 Wisconsin Ave., NW Suite 400
Washington, DC 20015
(202) 362-5903 (T)
(202) 362-6579 (F)
dctobin@tobinoconnor.com

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of February, 2023, I served a copy of the foregoing via the Court's ECF filing and service system on:

Dale Akins
Akins Law Firm, LLC
Post Office Box 1547
Bluffton, South Carolina 29910

/s/ John R.C. Bowen
John R.C. Bowen